

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

LAURIE ORTOLANO

VS NO: 22-CV-00326-LM

THE CITY OF NASHUA, Et Al.

DEPOSITION OF LAURIE ORTOLANO

This deposition taken by agreement of counsel
at the Law Offices of Cullen, Collimore & Shirley,
37 Technology Way, Suite 3W2, Nashua, New
Hampshire, on May 8, 2024, commencing at 10:20 a.m.

1 I am a citizen"?

2 A Yes.

3 Q Was that the first time you had notified Mr.

4 Feoli, you were a citizen of Nashua?

5 A Probably.

6 Q Why didn't you tell him that the first time

7 you communicated with him?

8 A I thought he knew when I started talking to

9 him about needing access to the files that we

10 don't have access to these files, and unless

11 they are brought back to the City, none of us

12 can go in there and get property record files

13 that we want to see if they are sitting in his

14 warehouse.

15 Q How would Mr. Feoli have known you were a

16 citizen of Nashua with some right to those

17 documents if you didn't identify yourself as

18 such?

19 A He explained to me his process, that they do

20 this for citizens all over the state. They

21 scan these files, bring them back in. He

22 explained how they set up a computer at city

23 hall that we would be able to access, that I

1 would be able to go to this computer in the
2 hallway as a citizen computer and open to the
3 public to use.

4 So he gave me this whole process of
5 how this information is downloaded for
6 citizens. So I believed he really knew it was
7 me, that I was not misrepresenting myself. I
8 thought I had a very good call with him.

9 Q And you indicated Mr. Feoli was very friendly
10 on your call with him?

11 A Yes.

12 Q And helpful?

13 A And explaining what he does to bring these
14 records back in and set up a computer that
15 citizens can go and research all of this data.

16 Q Now, did Mr. Feoli during one of your calls
17 recommend to you, you should contact Kimberly
18 to get access to the online database?

19 A I don't recall if he did. Oh, to get
20 access -- yes, I think he did do that. I do
21 think he did.

22 Q Did you ever speak to Ms. Kleiner about
23 getting that access?